

AFFIDAVIT

Your Affiant, Michael J. Schroeder #2353, being duly sworn, deposes and states:

1. Your Affiant, Michael J. Schroeder #2353 is a detective or employee of the City of Cleveland Division of Police, Narcotics/HIDI Unit, that is an officer who is empowered by law to conduct investigations, make arrests, and seize property for violations of Title 18, United States Code and Title 21, United States Code.
2. Your Affiant is a detective with the City of Cleveland Division of Police, Narcotics/HIDI Unit and has been so employed since September 18, 2000. During your Affiant's employment with the City of Cleveland Division of Police, your Affiant has been a member of the Cleveland Police Department for 18 years, and a detective for 8 years, is currently assigned to the Narcotics Unit.

TRAINING AND EXPERIENCE

3. Affiant has received training in the recognition of controlled substances, the methods of packaging them on the streets, and the recognition of narcotics trafficking as part of his basic course in the Cleveland Police Academy. Affiant has made hundreds of controlled buys of controlled substances and other illegal drugs using confidential

informants and direct buys and has made over a thousand arrests for the violation of the drug laws of the State of Ohio, and numerous of these arrests have led to convictions.

4. Affiant has conducted this investigation in conjunction with the Cleveland Drug Enforcement Administration. Affiant has been closely involved in every aspect of the investigation. Every fact stated in this affidavit has been observed by Affiant or has been relayed to Affiant by other local or federal investigators in the case.

PROBABLE CAUSE

5. On Saturday, July 14, 2018, members of the Cleveland Division of Police Narcotics/Heroin Involved Death Investigations Unit (HIDI) responded to a drug overdose victim at 1360 W. Mall Drive room #2401 Cleveland, Ohio 44113.

6. At the scene of the overdose, detectives observed a bag of suspected cocaine on the dresser. Suspected drug residue was also located on the dresser and the bathroom vanity.

7. The packaging material and narcotics were seized and processed as evidence. The narcotics were tested and were found to be a mixture of heroin, cocaine and fentanyl. The packaging material was tested for DNA. DNA found on the

packaging material was eventually found to match Terry CHRISTIAN.

8. Due to the profession of the victim, investigators determined that he may have gone to the Jack Casino in downtown, Cleveland.
9. A review of the victim's phone records indicates several calls on July 13th with (216) 224-0572 (**suspect phone 1**). The subscriber of suspect phone 1 was found to be Rashida Brown. A review of government databases revealed that CHRISTIAN shared an address with Brown and likely share a child together.
10. A review of the surveillance footage in the casino confirm CHRISTIAN meeting with the victim and multiple calls between them between 5:27 p.m. and 6:34 p.m.
11. At 6:39 p.m., the victim was observed departing the casino and standing outside on the sidewalk. At 6:42, the victim placed another call to suspect phone 1.
12. At approximately 6:47 p.m., a dark colored minivan bearing Ohio registration HFM5010 was observed pulling up to the sidewalk where the victim was standing. The victim was observed approaching the van, and making a hand to hand transaction with the passenger.
13. A review of the phone toll records of suspect phone 1 indicate several calls in this timeframe to (216) 307-0518

(suspect phone 2). The subscriber of this phone is Margaret Ridgell, who is the registered owner of the dark minivan.

14. A review of historical phone location data for suspect phone 1 and suspect phone 2 indicate that the two phone travelled in tandem to the downtown, Cleveland area on July 13, and departed in tandem following the time of the suspected hand to hand transaction with the victim.
15. When the victim's phone was recovered, several of the calls between the victim and suspect phone 1 mentioned above were deleted. Based on my training and experience, I know that it is common for drug users and traffickers to erase data from their phone in order to avoid detection by law enforcement.

CONCLUSION

16. Based upon the above listed facts and circumstances, Your Affiant has probable cause to believe, and does believe that, on or about July 13, 2018, Terry CHRISTIAN did in the Northern District of Ohio, Eastern Division, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, cocaine, Schedule II controlled substance; and fentanyl, a Schedule II controlled substance in violation of Title 21, United States Code,

Section 841 (a)(1). Your Affiant requests that an Arrest Warrant be issued for Terry CHRISTIAN.



Michael J. Schroeder #2353
Detective
City of Cleveland Division of
Police, Narcotics/HIDI Unit

Sworn to via telephone after
submission by reliable electronic
means. Crim.Rules. 4.1; 41(d)(3)



Thomas M. Parker
United States Magistrate Judge
2:47 PM, Oct 19, 2018